

Brussels, Belgium

July 3, 2006

Roland Schenkel  
Director General of the Joint Research Center  
Square de Meeus #8  
B-1049 Brussels

Dear Mr. Schenkel:

We would like to draw your attention to our concerns with the openness of the REACH legislative and regulatory process. As the REACH proposal approaches its second reading, we are committed to improving this regulation's workability, and will continue to constructively engage with the EU institutions to this end. We are also aware that REACH's environmental trade and competitiveness impacts will ultimately be determined by its final interpretation and implementation. For that reason, the work the European Commission is undertaking on guidance documents in the REACH Implementation Projects (RIPs) is crucial and significant, and the EU trading partners would like to participate in this process.

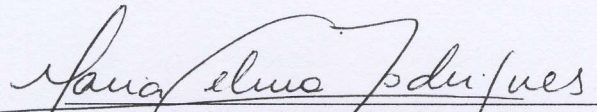
The Commission did not provide objective criteria on how stakeholder experts for these RIPs were and are being chosen. Stakeholders that are not members of European associations have largely been left without a voice. EU trading partners have much experience in chemicals management, and have requested to participate in and/or review many of the RIPs, but have not been provided clear guidance on how to engage in the RIP work, and how comments will be reviewed. The European Chemicals Bureau website indicates that "relevant committees and/or working groups organized by the Commission" will be involved in the consultation phase, leaving open the question of accessibility to all stakeholders. We request that clear and concise guidance on the consultation/public participatory process for all REACH-related activities, including an explanation of the feedback process, be provided at one "single access point." We believe that all stakeholders should have the opportunity to provide input either through the RIP stakeholder experts groups or by commenting on the draft guidance documents in their formative stages.



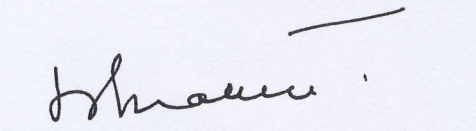
We appreciate the European Commission's commitment to widen opportunities for stakeholders to participate actively in EU policy-shaping. The Commission has rightfully stressed the importance of a high level of transparency, including consultation and participation, to the legitimacy of its work and development of better regulation.

We stand ready to cooperate in order to further improve the REACH text and its implementing documents.

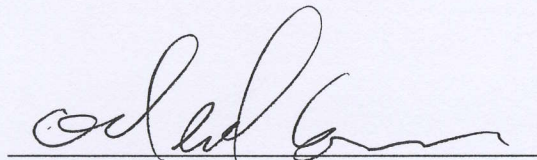
Sincerely,



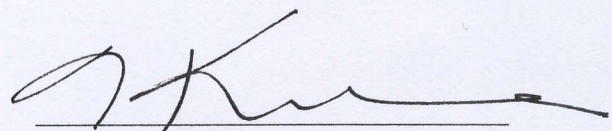
Maria Celina de Azevedo Rodrigues  
Ambassador of Brazil to the EU



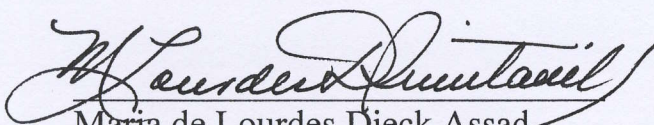
Dipak Chatterjee  
Ambassador of India to the EU



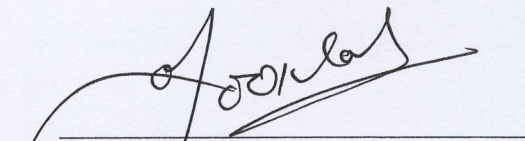
Oded Eran  
Ambassador of Israel to the EU



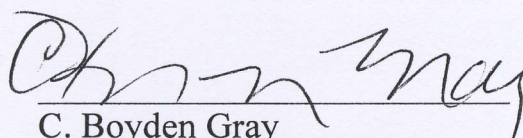
Takekazu Kawamura  
Ambassador of Japan to the EU




Maria de Lourdes Dieck Assad  
Ambassador of Mexico to the EU



Dr. Anil Sooklal  
Ambassador of South Africa to the EU

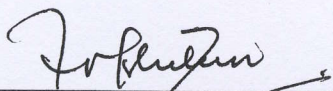


C. Boyden Gray  
Ambassador of the United States Mission to the EU

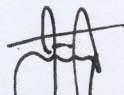


Woo-Seong Chong  
Ambassador of the Republic of Korea to the EU

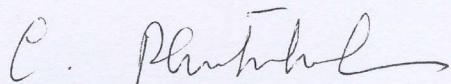




Ms. Nur Ashikin Mohd. Taib  
Charge d'Affaires, a.i. of the Embassy  
of Malaysia to the EC



Mr. Joseph Teo  
Charge d'Affaires, a.i. of the  
Embassy of Singapore to the EU



Ms. Chantipha Phutrakul  
Charge d'Affaires, a.i.  
Royal Thai Embassy

cc:

Gunter Verhuegen, Vice President and Commissioner for  
Enterprise and Industry

Roland Schenkel, Director General of the Joint Research Center

Jose Manuel Barroso, President of the European Commission

Dimitrios Kotzias, Acting Director, IHCP

Steven Eisenreich, Head of Unit for European Chemicals Bureau